

# **EXHIBIT A**

10/27/2005

Translation from Arabic

Hand written;

1- International Benevolence Foundation  
2- Benevolence Committee

*On The Name of Allah, the Most Merciful and Most Gracious  
{Illegible Emblem}*

**World Assembly of Muslim Youth**

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Office of the Secretary General

Number: 4431  
Date: 4/9/1413 H.

His Excellency, Mr. Adel Batterji, May God save him,  
Chairman, Benevolence International Islamic Committee Foundation,

May Peace and God's Mercy be on you.

I am pleased to your kind attention that the Assembly has learnt about your formation of an organization bearing the name Benevolence International Foundation. Since the similarity between the Foundation and the Benevolence Islamic Committee within the Assembly is clear, in terms of the unified emblem of both of them and their role and functions, I request of your Excellency that this be in consideration in the future, since it may have a confusing effect on the dealers and the donors, despite the fact that the two are not organizationally or administratively related.

I urge you to alert those who deal with your organization to be observant of that issue, if the Foundation's emblem and name remain the same, since the Assembly, along with its affiliate Benevolence Committee, is not responsible for the Foundation's activities or advertisements. I also wish to alert those who cooperate with the Foundation, in donation-collection within the Kingdom, to not confuse the Committee and the Foundation, considering the importance of this matter.

We gratefully appreciate your kind attention and cooperation.  
May Peace and God's Mercy be on you.

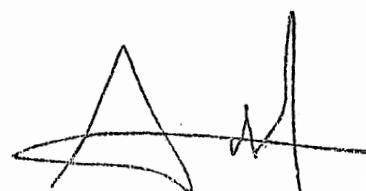
{Circular Seal of World Assembly of Muslim Youth}

S/M-225

Secretary General of World Muslim Youth,  
Dr. Sanel Bin Hammad Al-Jahani {Signed}

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Saudi Arabic, Tel: (01) 4641669/4841663. Cable: ISLAMYIAH RIYADH  
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World Assembly of Muslim Youth



الندوة العالمية للشباب الإسلامي

مكتب الأمين العام  
Office of the Secretary General

٤٤٣١ ..... الرقم  
٢٠١٢/٩/٢ ..... التاريخ

حفظه الله

سعادة الأخي الفاضل الاستاذ / عادل بترجي  
رئيس منظمة لجنة السير الإسلامية العالمية

السلام عليكم ورحمة الله وبركاته ..

يسري أن أحييكم سعادتكم كلما يأن الندوة قد مللت بتكوينكم منظمة تحمل اسم  
منظمة البر العالمية .. ولما كان المشابه واضحًا فيما بين المنظمة ولجنة البر  
الإسلامية في الندوة سواء من شاهمية الشعار الموحد لهما أو دورهما ووظيفتهم  
لما أرجو من سعادتكم أن يوحد ذلك مستقبلاً بعين الاعتبار حيث أن نتيجتكم قد تعود  
باللبر على المتعاملين والمتبرعين لهم عدم وجود رابطة بينهما من الناحية  
التنظيمية والإدارية ..

أمل التنبيه على المتعاونين مع منظمتكم بمراعاة ذلك أداً للشعار المنظمة  
على ما هو عليه واسمها كذلك حيث أن الندوة تعتبر غير مسؤولة مع لجنة البر  
التابعة لها مما يصدر من المنظمة من نشاطات أو املائات كما أرجو التأكيد على  
المتعاونين مع المنظمة في حالة جمع التبرعات داخل المملكة على عدم الخلط بين  
اللجنة والمنظمة تظلا لأهمية هذا الأمر ..

شاكرين ومقدرين حسن تعاونكم واستهمامكم ..

والسلام عليكم ورحمة الله وبركاته ..

الأمين العام  
الندوة العالمية للشباب الإسلامي  
د. مساحي بن حماد الجهمي



٢٢٥ - م/٢



TO WHOM IT MAY CONCERN  
STATEMENT CERTIFYING PROFESSIONAL TRANSLATION

The Language Link provides professional translation services. We have translated the attached documents from Arabic into English employing a team of professional and experienced translators who have a fluent knowledge of both languages.

We edited the translated text for meaning, accuracy and consistency with the original source text, and we proofread the translated text for spelling and grammatical accuracy.

We hereby certify that to the best of our knowledge, the translation that we have provided is an accurate and faithful translation of the original text provided to us.

Evren Ay

*ATA Certified Translator*

The Language Link, Inc.

**SWORN TO BEFORE ME THIS**  
1<sup>st</sup> day of November, 2005

  
Donna A. Garrison  
(Notary Public)

DONNA A. GARRISON  
Notary Public, State of New York  
No. 01H45092926  
Qualified In Kings County  
Commission Expires July 8, 2006

51 East 42nd Street, Suite 1510 New York, NY 10017

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

<i>IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001</i>	)	03 MDL No. 1570 (RCC)
	)	
	)	
	)	
THOMAS E. BURNETT, SR., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 03 CV 9849 (RCC)
	)	
AL BARAKA INVESTMENT AND DEVELOPMENT	)	
CORPORATION, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF ADEL A.J. BATTERJEE (D93)**

I, Adel A.J. Batterjee, being duly sworn, declare and state as follows:

1. I am over 18 years of age and competent to testify to the matters set forth below of my own personal knowledge.
2. I have been informed by my attorney that I am listed as a defendant (D93) in the above-captioned action. I am submitting this declaration in support of my Motion to Dismiss for lack of personal jurisdiction, failure to state a claim upon which relief can be granted and improper service of process.
3. I was born on June 1, 1946 in Jeddah, Saudi Arabia, and have lived in Saudi Arabia all of my life. I have always been a citizen of the Kingdom of Saudi Arabia.
4. I am a merchant in Jeddah, Saudi Arabia.
5. I first visited the United States when I came as a student from 1963-1967. I have visited the US since then, with the last visit in June 2000. The purposes of the visits were

personal.

6. I own no real property in the United States. I also have no bank accounts, and have no investments in the United States. I do not conduct any personal business with any businesses in the United States nor do I have a Social Security number.

7. I do not subscribe to or read either the *International Herald Tribune* or the *Al Quds al Arabi*. The latter publication, to my knowledge, is banned in the Kingdom of Saudi Arabia.

8. I have never supported the loss of innocent life and believe that there is no justification for the tragic attacks of September 11, 2001. I have never supported any person or organization that I have known to participate in terrorist activities. At no time did I ever knowingly participate in, or support in any way, terrorist activities, nor was anyone ever authorized by me, explicitly or implicitly, to engage in such activities.

9. The only specific allegations against me in the Third Amended Complaint in ¶¶75, 76, 180-5, 217-219, 228-230, 365 are rife with factual errors and incorrect associations. While the word 'Bir' in Arabic is translated as 'Benevolence', BIF was never a branch of Al Bir or vice versa. I never sent money to BIF in all its history and transferred all control in 1993, after which I exercised neither daily nor financial control of BIF in any way. Also, I never served as any executive of World Assembly of Muslim Youth, let alone Secretary-General. Furthermore, I was never charged or implicated in any criminal case in the US. Taken in their totality, all the allegations about me in the Third Amended Complaint portraying me as conducting business in the US and being tied, directly or indirectly, to al-Qaeda are false.

10. I also deny that I had any knowledge of the activities of Osama bin Laden and al Qaeda other than what is generally known through the press. Also, I never wrote a biography of

bin Laden as alleged in ¶230.

11. I also deny having any knowledge of any terrorist activities as alleged in ¶¶ 14, 15, 18, 20 and 38 of Plaintiffs' More Definite Statement as to Defendant Yousef Abdul Latif Jameel (Mar. 16, 2004), due largely to Plaintiff's lack of specificity and the secret nature of the alleged "evidence" used by the governments in their investigation and designation process.

12. I can read and understand English.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A.J. Batterjee  
Adel A.J. Batterjee

Executed on the 8th day of April, 2004.

## **EXHIBIT C**

World Assembly of Muslim Youth  
Member of the UN NGO'S



النَّدْوَةُ الْعَالَمِيَّةُ لِلشَّابِ الْإِسْلَامِيِّ  
عضو المنظمات غير الحكومية - هيئة الأمم المتحدة

Ref. No : 1/12175  
الرقم : 18/10/1426H  
Date : 20/11/2005G  
التاريخ :

مكتب الأمين العام  
The Secretary General Office

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001*

*03 MDL 1570 (RCC)*

**ECF Case**

This updated Declaration applies to:

*Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al.*, Case No. 04-CV-05970;  
*Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al.*, Case No. 04-CV-07279;  
*Federal Insurance Co., et al. v. Al Qaida, et al.*, Case No. 03-CV-6978;  
*New York Marine and General Insurance Co. v. Al Qaida, et al.*, Case No. 04-CV-6105;  
*World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al.*, Case No. 04-CV-07280.  
*Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02-CV-6977  
*Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investment and Development Corporation, et al.*, Case No. 04-CV-01923 (RCC)  
*Thomas E. Burnett, Sr., in his own right as the Father of Thomas E. Burnett, Jr., et al. v. Al Baraka Investment and Development Corporation, et al.* Case No. 03-CV-5738

**DECLARATION OF SALEH AL-WOHAIBI**

1. In the Name of God, the Merciful, the Compassionate, I, Saleh Al-Wohaibi, being duly sworn, declare and state the following:
2. I am the Secretary General of the World Assembly of Muslim Youth ("WAMY") located in Riyadh, Saudi Arabia.
3. I am submitting this declaration in support of WAMY's motions to dismiss for failure to state a claim upon which relief can be granted.



Ref. No : 1/12175 ..... الرقم : 1/12175  
18/10/1426H ..... التاريخ : 18/10/1426H  
Date : 20/11/2005G ..... التاريخ : 20/11/2005G

مكتب الأمين العام ..... The Secretary General Office

4. I am over 18 years of age and competent to testify to the matters set forth below from my personal knowledge.
5. WAMY is one of the world's largest Muslim youth organizations. WAMY believes in and strives for world peace and the betterment of humankind.
6. I have been informed by my attorney that WAMY is being sued in the above captioned action.
7. WAMY has never supported the loss of innocent lives; it believes that there is no justification for the tragic attacks of September 11, 2001. WAMY has never supported any person or organization known to participate in terrorist activities. At no time did WAMY knowingly participate in, or support in any way, terrorist activities, financially or otherwise, nor was anyone ever authorized by WAMY explicitly or implicitly, to engage in such activities.
8. WAMY has no affiliation and did not conduct any transaction with the entities and organizations that plaintiffs in their pleadings have labeled as "SAAR Network."
9. Ahmed Totonji and Jamal Barjanji are not founders of WAMY.
10. WAMY is a humanitarian organization. It has never participated or had a role in any arm conflict. It has never sent any of its members or employees to fight under Gulbadin Hekmatyar in Afghanistan. WAMY is a humanitarian organization
11. WAMY has never had any connection with Benevolence International Foundation (BIF).
12. Benevolence Foundation (BF) and BIF are two completely separate organizations, the former of which operated under the umbrella of WAMY on a few humanitarian projects.
13. In 1996 the Benevolence Foundation ceased to exist.
14. Dr. Adel Batterjee's dealings with WAMY were very limited and ended in 1993.
15. Dr. Batterjee was never a Secretary General of WAMY, nor did he hold any other official position within the organization. Dr. Batterjee never acted on behalf of or represented WAMY.



## World Assembly of Muslim Youth

### Member of the UN NGO'S

الدورة العالمية للشباب الإسلامي

عضو المنظمات غير الحكومية - هيئة الأمم المتحدة

Ref. No : 1/12175 الرقم : 18/10/1426Hالتاريخ : Date : - 20/11/2005G

مكتب الأمين العام

## The Secretary General Office

16. The following is a list of all the Secretary Generals of WAMY since its inception:

- 1) Dr. Abdul Hameed Abu Soliman (1973 to 1978)
- 2) Dr. Ahmad Bahafidhallah (1978 to 1981)
- 3) Dr. Tawfeeq Al Qusayyer (1981 to 1986)
- 4) Dr. Manih al Juhani (1986 to 2002)
- 5) Dr. Saleh S. Al-Wohaibi (2002 to present).

17. WAMY is a well respected humanitarian organization.

18. WAMY has a good working relationship with various countries in Africa, Asia, Europe and America. WAMY's humanitarian projects are usually coordinated and approved by the hosting countries.

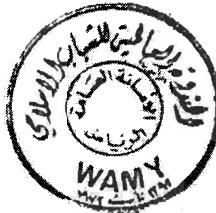
19. WAMY is a peaceful organization that believes in helping the needy, the orphans and the poor as well as victims of wars and natural disasters. WAMY believes in saving lives and not destroying them. Its humanitarian projects have saved many lives and offered educations to those youths who may otherwise have not received one.

20. Since its existence, WAMY has never intentionally or knowingly carried out or assisted in any way illegal activities that would cause harm to any person, nation or property.

21. WAMY is a separate and distinct organization from the International Islamic Relief Organization ("IIRO").

22. I speak both English and Arabic languages.

I declare under the penalties of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed on this 19 day of November, 2005.





Saleh Al-Wohabi